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                    UNITED STATES DISTRICT COURT

                  NORTHERN DISTRICT OF CALIFORNIA

                    SAN FRANCISCO DIVISION

OMAR ABDULAZIZ, Plaintiff, v. TWITTER, INC.; McKINSEY & CO., Defendants.	Case No. 3:19-cv-06694-LB **DECLARATION OF TWITTER EMPLOYEE IN SUPPORT OF TWITTER, INC.'S MOTION TO DISMISS PLAINTIFF'S COMPLAINT** Date: January 23, 2020 Time: 9:30 a.m. Dept.: Courtroom B- 15th Floor Judge: Hon. Laurel Beeler Date Filed: October 18, 2019 Trial Date: Not Yet Set

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23   REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED

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DECLARATION OF TWITTER EMPLOYEE IN SUPPORT OF MOTION TO DISMISS
Case No. 3:19-cv-06694-LB

1360660

1   I, ███████████ declare as follows:

2   1.   I am ███████████████ at Twitter, Inc. ("Twitter"). I have been

3   employed with Twitter since March 2010. I submit this declaration in connection with Twitter's

4   Motion to Dismiss Plaintiff's Complaint. I have personal knowledge of the facts stated in this

5   declaration and, if called as a witness, could and would testify competently as to those facts.

6   2.   In December 2015, I was ███████████ on the Trust & Safety Team at Twitter.

7   Through my role on Twitter's Trust & Safety Team, I was a member of the cross-functional team

8   responsible for drafting and sending email notifications to Twitter users whose accounts had

9   potentially been targeted by a state-sponsored actor.

10   3.   On or about December 11, 2015, Twitter sent notifications to potentially affected

11   users via email. The notifications were sent in various languages corresponding to the language

12   selected by the user when he or she signed up for his or her Twitter account. Attached hereto as

13   **Exhibit 1** is a true and correct copy of the text of the December 11, 2015 email notification.

14   4.   As reflected in Twitter's records, Twitter also began notifying potentially affected

15   users via an in-app message (a "UMF notice") on or about that same date, December 11, 2015.

16   The notification was provided in various languages corresponding to the language selected by the

17   user when he or she signed up for his or her Twitter account. Attached hereto as **Exhibit 2** is a

18   true and correct copy of the English version of the in-app notification.

19   5.   Attached hereto as **Exhibit 3** is a true and correct copy of a .txt file containing a

20   list of User ID Numbers of users who were sent the email notification discussed in Paragraph 3

21   above in English. The list includes Plaintiff's User ID Number: ███████ which indicates that

22   Twitter sent him the email notification in English at the e-mail address Twitter has on file for him

23   which is: ███████████ Plaintiff's User ID Number appears on page 1 of this Exhibit.

24   This .txt file was created on or around December 11, 2015, and has been maintained in Twitter's

25   records since that time. This Exhibit has been redacted to remove reference to users other than

26   Plaintiff.

27   6.   Attached hereto as **Exhibit 4** is a true and correct copy of a list of User ID

28   Numbers of users who were sent the in-app notification ("UMF notice") discussed in Paragraph 4

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1   above. The list includes Plaintiff's User ID Number: ███████ which indicates that Twitter

2   sent him the UMF notice. Plaintiff's User ID Number appears on page 24 of this Exhibit. This

3   list was created on or around December 11, 2015, and has been maintained in Twitter's records as

4   a Microsoft Excel spreadsheet since that time. This Exhibit has been redacted to remove

5   reference to users other than the Plaintiff.

6   I declare under penalty of perjury under the laws of the State of California that the

7   foregoing is true and correct, and that this declaration was executed in San Francisco, California

8   on December 16, 2019.

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